

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

THE DAILY WIRE, LLC *et al.*,

Plaintiffs

v.

UNITED STATES DEPARTMENT  
OF STATE *et al.*,

Defendants.

Civil Action No. 6:23-cv-00609 (JDK)

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEADLINES  
IN THE AMENDED PRELIMINARY INJUNCTION SCHEDULING ORDER  
(ECF NO. 81)**

Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiffs respectfully move this Court for an extension of time for the deadlines set forth in ECF No. 81, the Amended Preliminary Injunction Scheduling Order.

Good cause exists to support this request. Nine days before the deadline to notify the Court about any additional subpoenas or depositions Plaintiffs might seek, Defendants produced an additional 2,000-plus documents—more documents than the total of all seven prior document productions made during the expedited discovery period. Additionally, Defendants served its final Privilege Log related to the final expedited document production, which consisted of over 80 pages. The Privilege Logs related to the seven earlier document productions totaled only 53 pages. Plaintiffs' attorneys are unable to review these documents and the accompanying Privilege Log in this timeframe, especially given commitments in other cases.

Defendants represented that they produced the documents and Privilege Logs as expeditiously as possible and agree that good cause justifies revising the amended scheduling order. Accordingly, the Plaintiffs respectfully request the Court enter the proposed revised schedule set forth below and in the proposed order.

**[PROPOSED] SCHEDULE**

If any of these dates fall on a weekend or Court holiday, the deadline is modified to be the next Court business day. Also note that all deadlines in this order are for **filing** or **delivery, not mailing** dates.

November 14, 2024	Plaintiffs provide Defendants notice of intent to seek depositions or additional third-party subpoenas for preliminary injunction.
November 21, 2024	Deadline to file any motions concerning Plaintiffs' notice of intent to seek depositions or additional third-party subpoenas for preliminary injunction.  Lead counsel for each party must meet and confer as required by Local Rule CV-7(h) either in person or by telephone before filing any motions.
November 26, 2024	Deadline for responses to any motions concerning Plaintiffs' notice of intent to seek depositions or additional third-party subpoenas for preliminary injunction.
November 29, 2024	Plaintiffs serve additional third-party subpoenas, if needed.
January 10, 2025	All preliminary injunction discovery, including third-party discovery and depositions, closes.
January 31, 2025	Deadline for Plaintiffs to file an amended motion for preliminary injunction limited to 35 pages, excluding the table of contents, table of authorities, signature blocks, and certificates.
February 21, 2025	Deadline for Defendants to file a response to the amended motion for preliminary injunction limited to 40 pages, excluding the table of contents, table of authorities, signature blocks, and certificates.
March 7, 2025	Deadline for Plaintiffs to file a reply in support of their amended motion for preliminary injunction limited to 15 pages excluding the table of contents, table of authorities, signature blocks, and certificates.
April 7, 2025	Deadline for motions to amend pleadings.
April 14, 2025	Deadline for joint status report on remaining discovery needed.  The parties shall meet and confer and file a notice regarding completion of Rule 26 and third-party discovery, including the potential need for periodic status conferences, whether the anticipated six months from the preliminary injunction ruling is adequate for completing discovery, and any adjustments to the limits on discovery.

Dated: October 28, 2024

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Respectfully submitted,

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**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(h)–(i), I certify that: (1) I complied with this Court’s conferral requirement for motions and (2) this motion is unopposed by Defendants.

/s/ Margot J. Cleveland

**CERTIFICATE OF SERVICE**

On October 28, 2024, I electronically submitted this document to the clerk of the court of the U.S. District Court for the Eastern District of Texas using the court’s electronic case filing system. I certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Margot J. Cleveland